

## **Modern Slavery Statement Introduction**

Due to the nature of our business we recognise that we could be at risk of exposure to modern slavery and human trafficking. We are committed to improving our practices to combat slavery and human trafficking. We take this responsibility very seriously and take every step to ensure that we do not do any business with any supply chains that directly or indirectly benefit from slavery or human trafficking. This statement has been produced in accordance with the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending 2018.

## **Organisation's structure**

NewtonFirst Group is an independently owned group of specialist training, recruitment and HR businesses. Established in 2016. There are two subsidiary companies of NewtonFirst group, NewtonFirts recruitment and NewtonFirst HR and Employment Law.

Both companies are owned and managed by James Newton CEO and MD.

Both companies are based in Glasgow Scotland and currently the group employs a total of 12 employees.

## **Supplier adherence to our values and ethics**

We have zero tolerance to slavery and human trafficking. To ensure that all in our supply chain and contractors comply with our values and ethics, we have a dedicated compliance team, which consists of representatives from the following departments; Compliance, Human Resources, Procurement and Sales.

## **Our policies on slavery and human trafficking**

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery and Human Trafficking Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in business or our supply chains.

## **Due diligence processes for slavery and human trafficking**

As part of our initiative to identify and mitigate risk, we adhere to our policy standards along with the guidelines from the Ethical Trading Initiative. As part of our due diligence, we ensure that all new suppliers are visited on site, suppliers are audited prior to supply and re-audited every year to ensure adherence to our strict standards of ethically transparent supply chains. We also have in place systems to:

- Identify and assess potential risk areas in our supply chains, to include country and business transaction risk
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains.

## **Whistleblowing Policy**

We have a robust whistleblowing policy in place for individuals to raise any concerns that they may have. Reports can be made anonymously. All reports are logged and investigated accordingly.

## **Training and Awareness**

To ensure a high level of understanding of the risks of modern slavery and human trafficking, as well as all aspects of regulations, laws and standards in our supply chains and our business, we provide training to all of our staff. This training forms part of the induction process which every new employee attends within their first month, as well as refresher training and assessment, which is completed 6 monthly for all staff, including those staff involved in the supply chain, e.g. Procurement, Sales etc. to ensure that they are aware of our stance on preventing slavery and human trafficking within our business and supply chains.

Stronger Together Posters are in place within the organisation.

## **Our effectiveness in combating slavery and human trafficking**

We use the following means to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

- Business function reports
- Internal staff training and induction process
- Our suppliers are obliged to audit their own supply chains and report on their findings in 2018.